STATE OF INDIANA INDIANA UTILITY REGULATORY COMMISSION

FILED

MAY 2 4 2001

IN THE MATTER OF THE PETITION OF INDIANA)
BELL TELEPHONE COMPANY, INCORPORATED,	INGIANA UTILITY ESECTATIONY COMMISSI
D/B/A AMERITECH INDIANA PURSUANT TO)
I.C. 8-1-2-61 FOR A THREE-PHASE PROCESS) CAUSE NO. 41657
FOR COMMISSION REVIEW OF VARIOUS)
SUBMISSIONS OF AMERITECH INDIANA TO)
SHOW COMPLIANCE WITH SECTION 271(C) OF	
THE TELECOMMUNICATIONS ACT OF 1996)

PETITION TO INTERVENE

The Competitive Telecommunications Association ("CompTel") by counsel, hereby petitions for leave to intervene in the above referenced proceeding and in support states:

- 1. CompTel is a principal industry association representing competitive telecommunications providers, whose members include many of the competitive local exchange carriers currently competing in Indiana. CompTel's members provide a wide range of competitive services to both residential and business customers in the state, including local, long distance, data and Internet services.
- 2. On February 2, 2000, Indiana Bell Telephone Company, Inc. d/b/a Ameritech Indiana filed the above-captioned petition to provide intrastate, interLATA telecommunications services in the state of Indiana. The application was filed pursuant to I.C. 8-1-2-61 and Section 271 (c) of the Communications Act, as amended.¹
- 3. CompTel seeks to intervene in this proceeding, and requests permission to participate and file comments. CompTel has been actively involved in numerous section 271 proceedings at both the state and federal levels. Several of CompTel's members, in fact, have

⁴⁷ U.S.C. §271 (c).

already intervened and are participating in this proceeding.² Further, permitting CompTel to intervene on behalf of its members would allow a greater number of parties to participate in this proceeding, thereby expanding the record and aiding the Commission's decision-making process.

- 4. CompTel has a substantial interest in this proceeding as the decisions made in this cause will directly impact CompTel's Indiana operating member companies and influence the decision of other CompTel members to enter the Indiana telecommunications market.

 CompTel's intervention is necessary and in the public interest.
- 5. CompTel's intervention will not unduly broaden the issues and CompTel acknowledges it will be bound by the record in existence prior to the granting of this Petition.
- 6. Should this Petition be granted, CompTel requests that the Commission and all parties include on the Service List CompTel's Director of Regulatory and State Affairs, Maureen Flood, in accordance with the following: 1900 M Street, NW, Suite 800, Washington, DC, 20036; (202) 296-6650, (202) 296-7585 (fax). The attorneys representing CompTel in this proceeding are:

Nikki G. Shoultz Sommer & Barnard, PC 111 Monument Circle, #4000 Indianapolis, IN 46204-5198 (317) 630-5951 (317) 236-9802 fax nshoultz@sommerbarnard.com

Robert J. Aamoth Andrew M. Klein Kelley Drye & Warren LLP 1200 19th Street, N.W. 1200 19th Street, N.W. Washington, D.C. 20036 (202) 955-9600 (telephone) (202) 955-9792 (facsimile) RAamoth@KelleyDrye.com AKlein@KelleyDrye.com

These members include McLeod USA, WorldCom, AT&T and Z-Tel.

WHEREFORE, CompTel respectfully requests that the Commission grant it leave to intervene, and permission to fully participate in this proceeding.

Respectfully submitted,

Nikki G./Shoultz, Attorney No. 16509-41

Sommer & Barnard, PC

111 Monument Circle, #4000

Indianapolis, IN 46204-5198

(317) 630-5951

(317) 236-9802 fax

nshoultz@sommerbarnard.com

Robert J. Aamoth Andrew M. Klein Kelley Drye & Warren LLP 1200 19th Street, N.W. Washington, D.C. 20036 (202) 955-9600 (telephone) (202) 955-9792 (facsimile) RAamoth@KelleyDrye.com AKlein@KelleyDrye.com

CERTIFICATE OF SERVICE

The undersigned certifies that on the 24^{+1} day of May, 2001, copies of the foregoing were mailed by first class United States mail, postage prepaid, to:

Karol Krohn
Office of Utility Consumer Counselor
Indiana Government Center North
100 North Senate, Room N501
Indianapolis, IN 46204

Bonnie Simmons Ameritech Indiana 240 N. Meridian Street, Room 1826 Indianapolis, IN 46204

Pamela H. Sherwood Time Warner Telecom of Indiana, LP 4625 W. 86th Street, Suite 500 Indianapolis, IN 46268

Mr. Jack R. Boheim President MTG Consulting P.O. Box 2448 Mendocino, CA 95460

Richard E. Aikman, Jr. Stewart & Irwin, P.C. 251 East Ohio Street, Suite 1100 Indianapolis, IN 46204-2142

William A. Haas McLeodUSA Telecom Services, Inc. McLeodUSA Technology Park P.O. Box 3177 Cedar Rapids, IA 52406-3177

Charles R. Mercer, Jr.
Sprint
One North Capitol Ave., Suite 540
Indianapolis, IN 46204

Michael J. Huston Michael E. Allen Baker & Daniels 300 North Meridian Street, Suite 2700 Indianapolis, IN 46204

Douglas W. Trabaris Senior Attorney AT&T Corp. 222 West Adams, 15th Floor Chicago, IL 60606

John Kern 2300 N. Barrington Road Suite 400 Hoffman Estates, IL 60195

Frank Darr National Regulatory Research Institute 1080 Carmack Road Columbus, Ohio 43210

Ellyn Elise Crutcher
Associate General Counsel
McLeodUSA Telecommunications
Services, Inc.
121 South 17th Street
Mattoon, IL 61938

Robert K. Johnson Christopher C. Earle Bose, McKinney & Evans LLP 135 North Pennsylvania Street, Suite 2700 Indianapolis, IN 46204

Nikki Gray Shoultz

X:\NGS\CompTel \ 271InterventionPet5-24-01